### UNITED STATES BANKRUPTCY COURT DISTRICT OF NORTH DAKOTA

In Re:	Case No.: 25-30002
Generations on 1st, LLC,  Debtor.	Chapter 11 (Main Case)
In Re:	Case No.: 25-30003
Parkside Place, LLC,  Debtor.	Chapter 11 (Jointly Administered)

#### DECLARATION OF ROLAND CLAUSEN (CLAUSEN CONSTRUCTION, INC.) CERTIFYING RECORDS PURSUANT TO FEDERAL RULE OF EVIDENCE 902(11)

STATE OF SOUTH DAKOTA	) ) SS
COUNTY OF CODINGTON	)

Roland Clausen, pursuant to 28 U.S.C. § 1746, hereby certifies as follows:

- 1. I am over 18 years of age, of sound mind, and otherwise competent to make this Certification. The evidence set out in this Certification is based on my personal knowledge.
- 2. I am the President of Clausen Construction, Inc. ("<u>Clausen</u>") located in Watertown, South Dakota and have been employed by Clausen since 1978. Clausen provides mass excavation, demolition, earthwork, and site preparation.
- 3. I am the records custodian for Clausen.
- 4. Clausen was subpoenaed for records in the lawsuit *Red River State Bank v. The Ruins, LLC, et. al.*, Codington County Circuit Court, South Dakota, Case No. 14CIV24-68. Clausen responded to the subpoena and provided documents as requested.

- 5. I have personal knowledge of the construction of the 63-unit mid/high rise building located at 315 East Kemp Ave., Watertown, South Dakota (the "Ruins Project"). Clausen provided mass excavation, demolition, earthwork and site preparation for the Ruins Project.
- 6. I have personal knowledge of the construction of the mixed-use building located at 26 1<sup>st</sup> Ave. SW, Watertown, South Dakota (the "<u>Generations Project</u>"). Clausen provided mass excavation, demolition, earthwork and site preparation for the Generations Project.
- 7. I have personal knowledge of the construction of the Parkside Place apartment building located at 8 2<sup>nd</sup> St NE, Watertown, South Dakota (the "<u>Parkside Project</u>"). Clausen provided mass excavation, demolition, earthwork and site preparation for the Parkside Project.
- 8. I have personal knowledge of the construction of the mixed-use building located at 10 N. Broadway, Watertown, South Dakota (the "<u>Lofts Project</u>"). Clausen provided mass excavation, demolition, earthwork and site preparation for the Lofts Project.
- 9. Clausen also provided excavation, earthwork and site preparation for Jesse and Mulinda Craig's lake property located at 22587 Knollwood Lane, Pelican Rapids, Minnesota 56572 (the "Craig Lake Home").
- 10. True and correct copies of Clausen's estimate and invoices for the Ruins Project (Invoice #'s 589, 707, 714, 725, 728, 744, and 824) are attached as **Exhibit A**.
- 11. True and correct copies of Clausen's invoices for the Generations Project (Invoice #'s 590, 631, 715, 716, and 745) are attached as **Exhibit B**.
- 12. True and correct copies of Clausen's estimate and invoices for the Parkside Project (Invoice #'s 520, 554, 572, 585, and 634) are attached as **Exhibit C**.
- 13. True and correct copies of Clausen's estimate and invoices for the Lofts Project (Invoice #'s 367 and 470) are attached as **Exhibit D**.
- 14. A true and correct copy of Clausen's invoice for the Craig Lake Property (Invoice # 726) is attached as **Exhibit E**.
- 15. The documents attached as Exhibits A (Ruins Invoices), B (Generations Invoices), C (Parkside Invoices), D (Lofts Invoices), and E (Craig Lake Property Invoice) were made at or near the time of the events set forth therein by myself and other people with knowledge of those matters.
- 16. It was the regular practice of Clausen's business activities to make the records and/or to keep copies from information transmitted by attached as **Exhibits A, B, C, D, and E**.

- 17. The records attached as **Exhibit A, B, C, D, and E** were kept in the regular course of business activity.
- 18. I certify under penalty of perjury that the foregoing is true and correct.

Executed on 9 day of October, 2025.

ーSigned by:

Roland Clausen

## **Exhibit A Clausen Construction, Inc.**

The Ruins Project Estimate and Invoices This is the process in which I came up with my price for the demo work of the old apartments.

I figured an average of 1 inch of motor on each of the interior walls plus ceilings. Then there was mesh wire attached to wood studs. The exterior walls have the mortar mesh then brick instead of wood and another layer of motor on the exterior face of the building besides the front face. This material would have to be trucked out to the landfill. Our estimate for the tonnage on this material is 1994.2 and our price per ton for that material to be taken out to the landfill would be \$40 per ton. So, our estimate for landfill material would end up to be \$79,768.00.

The cement walls and floor in the basement and floor of the basement would be trucked out to a local farmer who has agreed to take the concrete. The trucking and disposal fee the farmer wants, would come up to \$24,750.00

Our breakdown for our hourly work is

5 trucks @ \$125 per hour avg. 9 hrs per day

Excavator@ 180 per hour avg. 10 hrs per day

Loader @ 155 per hour

Skid steer @ 100 per hour

We estimate this would take 6.5 days to complete the demolition if we don't run into any surprises.

**Our Totals** 

\$64837.50= Equipment @ hourly rates

\$104,518= Rubble disposal

\$3,456.54= Excise Tax

Total = \$172,812.04

Invoice 589



Ruins

BILL TO
Jesse Craig

DATE 02/25/2021 PLEASE PAY \$0.00

DUE DATE 03/27/2021

DESCRIPTION	QTY	RATE	AMOUNT
excavator hours	5	190.00	950.00T
2 excavator hours	16	190.00	3,040.00T
2 excavator hours	19	190.00	3,610.00T
ruck hours	8.50	125.00	1,062.50T
2 excavator hours	16	190.00	3,040.00T
ruck hours	7.50	125.00	937.50T
skidsteer hours	3	100-00	300.00T
excavator hours	8	V V	1,520.00T
ruck hours	4.50	125.00	562.50T
kidsteer hours	4	100.00	400.00T
ong stick excavator rental			3,936.00T
xcavator hours	8	190.00	1,520.00T
truck hours	42.50	125.00	5,312.50T
xcavator hours	9.50	190.00	1,805.00T
truck hours	47.50	125.00	5,937.50T
excavator hours	9.50	190.00	1,805.00T
truck hours	47.50	125.00	5,937.50T
xcavator hours	9.50	190.00	1,805.00 <b>T</b>
truck hours	45	125.00	5,625.00T
xcavator hours	5	190.00	950.00T
ruck hours	5.50	125.00	687.50T
pader hours	9	165.00	1,485.00T
andfill fees			95,596.80T
enerator cost do to cold weather - eeded to plug in machines			6,000.00T

Case 25-30002 Doc 190 Filed 10/14/25 Entered 10/14/25 09:31:34 Desc Main Document Page 7 of 40

Palace Apartments demo

 SUBTOTAL
 153,825.30

 TAX
 3,139.57

 TOTAL
 156,964.87

 PAYMENT
 156,964.87

 TOTAL DUE
 \$0.00

Invoice 707



BILL TO

Jesse Craig

DATE 12/14/2021 PLEASE PAY \$0.00 DUE DATE 01/13/2022

DESCRIPTION	QTY	RATE	AMOUNT
Nov 17 Excavator hrs	9.50	185.00	1,757.50T
Nov 17 2 truck hrs	19	135.00	2,565.00T
Nov 18 Excavator hrs	8	185.00	1,480.00T
Nov 18 skidsteer hrs	8	100.00	800.00T
Nov 18 3 truck hrs	24	135.00	3,240.00T
Day 3 Excavator hrs	8	185.00	1,480.00T
Day 3 skidsteer hrs	8	100-00	800.00T
Day 3 - 3 truck hrs	24		3,240.00T
Day 3 1 truck hrs	6	135.00	, 810.00T
Day 4 Excavator hrs	8	185.00	1,480.00T
Day 4 skidsteer hrs	8	100.00	800.00T
Day 4 - 2 truck hrs	16	135.00	2,160.00T
Day 4 - 1 truck hrs	7.50	135.00	1,012.50T
Day 5 Excavator hrs	8	185.00	1,480.00T
Day 5 skidsteer hrs	8	100.00	800.00T
Day 5 3 truck hrs	24	135.00	3,240.00T
Day 5 1 truck hrs	9	135.00	1,215.00T
Day 6 Excavator hrs	9	185.00	1,665.00T
Day 6 skidsteer hrs	9	100.00	T00.00e
Day 6 4 truck hrs	36	135.00	4,860.00T
Day 7 Excavator hrs	5	185.00	925.00T
Day 7 skidsteer hrs	5	100.00	500.00T
Day 7 4 truck hrs	20	135.00	2,700.00T
Put fence up - 3 men hrs	4.50	65.00	292.50T
Dump fees			20,863.57T

## Case 25-30002 Doc 190 Filed 10/14/25 Entered 10/14/25 09:31:34 Desc Main Document Page 9 of 40

DESCRIPTION	QTY	RATE	AMOUNT
getting rid of concrete with rebar in it Farmer			6,500.00T
Ruins		SUBTOTAL	67,566.07
		TAX	1,379.02
		TOTAL	68,945.09
		PAYMENT	68,945.09
		TOTAL DUE	\$0.00

Invoice 714



**BILL TO** 

Jesse Craig

DATE 01/16/2022 PLEASE PAY \$0.00 DUE DATE 02/15/2022

DESCRIPTION	QTY	RATE	AMOUNT
Nov 29 - excavator hrs	8.50	185.00	1,572.50T
2 truck hrs	17	135.00	2,295.00T
skidsteer hrs	8.50	100.00	850.00T
Nov 30 - excavator hrs	8.50	185.00	1,572.50T
2 truck hrs	17	135.00	2,295.00T
skidsteer hrs	8.50	100.00	850.00T
Dec 1 - Excavator hrs	8.50	185-00	1,572.50T
2 truck hrs	17	( )	2,295.00T
skidsteer hrs	8.50	100.00	850.00T
oader hrs	8.50	185.00	1,572.50T
Dec 2 - excavator hrs	9	185.00	1,665.00T
skidsteer hrs	9	100.00	900.00T
2 truck hrs	18	135.00	2,430.00T
pader hrs	9	185.00	1,665.00T
Dec 3 - Excavator hrs	9	185.00	1,665.00T
skidsteer hrs	9	100.00	900.00T
2 truck hrs	18	135.00	2,430.00T
Dec 6 - Excavator hrs	9	185.00	1,665.00T
skidsteer hrs	9	100.00	900.00T
? truck hrs	18	135.00	2,430.00T
Dec 7 - Excavator hrs	9	185.00	1,665.00T
? truck hrs	18	135.00	2,430.00T
Dec 8 - Excavator hrs	9	185.00	1,665.00T
kidsteer hrs	9	100.00	900.00T
3 truck hrs	27	135.00	3,645.00T

## Case 25-30002 Doc 190 Filed 10/14/25 Entered 10/14/25 09:31:34 Desc Main Document Page 11 of 40

DESCRIPTION	QTY	RATE		AMOUNT
Dec 9 - Excavator hrs	9	185.00		1,665.00T
2 truck hrs	18	135.00		2,430.00T
Dec 10 - Excavator hrs	9	185.00		1,665.00T
4 truck hrs	36	135.00		4,860.00T
Dec 13 - Excavator hrs	9	185.00		1,665.00T
4 truck hrs	36	135.00		4,860.00T
Dec 14 - Excavator hrs	9.50	185.00		1,757.50T
4 truck hrs	38	135.00		5,130.00T
Dec 15 - Excavator hrs	9.50	185.00		1,757.50T
skidsteer hrs	9.50	100.00		950.00T
truck hrs	28.50	135.00		3,847.50T
Dec 16 - Excavator hrs	2	185.00		370.00T
ruck hrs	4	135.00		540.00T
1.5% - Applied on Mar 18, 2022				1,135.37T
RUINS			SUBTOTAL	75,312.87
			TAX	4,821.54
			TOTAL	80,134.41
			PAYMENT	80,134.41
			TOTAL DUE	\$0.00

Invoice 725



BILL TO

Jesse Craig

DATE 02/18/2022 PLEASE PAY \$0.00

DUE DATE 03/20/2022

DESCRIPTION	QTY	RATE	AMOUNT
Ruins project - see attachments for description			109,827.50T
		SUBTOTAL	109,827.50
		TAX	2,241.58
		TOTAL	112,069.08
		PAYMENT	112,069.08
		TOTAL DUE	\$0.00
		W.	THANK YOU.

Case 25-30002 Doc 190 Filed 10/14/25 Entered 10/14/25 09:31:34 Desc Main Document Page 13 of 40

Clausen Construction Incorporated 45852 169th St Watertown, SD 57201 US clausenconstructioninc@gmail.com

Invoice 728





**BILL TO** 

Jesse Craig

DATE 03/28/2022 PLEASE PAY \$0.00 DUE DATE 04/27/2022

DESCRIPTION	QTY	RATE	AMOUNT
Time on attached			114,187.50T
Material and rental on attached	-		73,691.82T
		SUBTOTAL	187,879.32
		TAX	3,834.62
		TAL	191,713.94
		PAYMENT	191,713.94
		TOTAL DUE	\$0.00

Invoice 744



**BILL TO** 

Jesse Craig

DATE 05/22/2022 PLEASE PAY \$0.00

DUE DATE 06/21/2022

DESCRIPTION	QTY	RATE	AMOUNT
RUINS - Mar 28-2022 2 loader hours	18	165.00	2,970.00T
skidsteer hours	4	100.00	400.00T
excavator packer hrs	8.50	250.00	2,125.00T
Packer hours	8.50	165.00	1,402.50T
3 truck hours	27	135.00	3,645.00T
1 truck hours	4	135.00	540.00T
D8 dozer hours	10	200-00	2,000.00T
April 26 2022 skidsteer hours	1.50		150.00T
men hours	3	65.00	195.00T
		SUBTOTAL	13,427.50

TAX 274.06 **TOTAL** 13,701.56 **PAYMENT** 13,701.56 \$0.00

TOTAL DUE

Invoice 824



BILL TO

Jesse Craig

DATE 10/09/2022 PLEASE PAY \$33,400.61

DUE DATE 11/08/2022

DESCRIPTION	QTY	RATE		AMOUNT
RUINS - FINISH INSIDE OF BUILDING				
Day 1 skidsteer hours	12	125.00		1,500.00T
grader skidsteer hours	12	165.00		1,980.00T
truck hours	12	145.00		1,740.00T
Day 2 - skidsteer hours	12	125.00		1,500.00T
grader skidsteer	12	165.00		1,980.00T
truck hours	12	145.00		1,740.00T
Day 3 - skidsteer hours	12	125.00		1,500.00T
grader skidsteer	12	165.00		1,980.00T
truck hours	4	145.00		580.00T
Day 4 - skidsteer hours	12	125.00		1,500.00T
grader skidsteer hours	12	165.00		1,980.00T
truck hours	12	145.00		1,740.00T
Day 5 - skidsteer hours	12	125.00		1,500.00T
grader skidsteer hours	12	165.00		1,980.00T
truck hours	11	145.00		1,595.00T
Day 6 - skidsteer hours	12	125.00		1,500.00T
grader skidsteer hours	12	165.00		1,980.00T
material tons	812.92	4.50		3,658.14T
crushed gravel tons	57.10	14.00		799.40T
			SUBTOTAL	32,732.54
			TAX	668.07
			TOTAL	33,400.61

TOTAL DUE \$33,400.61

## **Exhibit B Clausen Construction, Inc.**

## **Generations Project Invoices**

Invoice 590



BILL TO

Jesse Craig

DATE 04/08/2021 PLEASE PAY \$0.00

DUE DATE 05/08/2021

DESCRIPTION	QTY	RATE	AMOUNT
Big Excavator hours	4	195.00	780.00T
Excavator hours	4	190.00	760.00T
Excavator hours	9	190.00	1,710.00T
skidsteer hours	3	100.00	300.00T
Truck hours	9	100.00	900.00T
Excavator hours	9	190.00	•
Loader hours	3	165-00	1,710.00T
skidsteer hours	1	$\langle \rangle \rangle \vee$	495.00T
Truck hours	9	100.00	100.00T
Excavator hours	10.50	190.00	900.00T
Truck hours	10.50	100.00	1,995.00T
Big Excavator hours	4	195.00	1,050.00T
Excavator hours	10.50	190.00	780.00T
Loader hours	4	165.00	1,995.00T
skidsteer hours			660.00T
ruck hours	3	100.00	300.00T
Big excavator hours	10.50	100.00	1,050.00T
	5	195.00	975.00T
Excavator hours	10.50	190.00	1,995.00T
pader hours	6	165.00	990.00T
kidsteer hours	5	100.00	500.00T
ruck hours	6	100.00	600.00T
Big excavator hours	4	195.00	780.00T
xcavator hours	10.50	190.00	1,995.00T
pader hours	3	165.00	495.00T
kidsteer hours	3	100.00	300.00T

## Case 25-30002 Doc 190 Filed 10/14/25 Entered 10/14/25 09:31:34 Desc Main Document Page 18 of 40

DESCRIPTION	QTY	RATE	AMOUNT
truck hours	7	100.00	700.00T
Big Excavator hours	5	195.00	975.00T
Excavator hours	11	190.00	2,090.00T
loader hours	4	165.00	660.00T
skidsteer hours	3	100.00	300.00T
truck hours	7	100.00	700.00T
Excavator hours	5	190.00	950.00T
loader hours	5	165.00	825.00T
truck hours	5	100.00	500.00T
Big Excavator hours	11	195.00	2,145.00T
Excavator hours	11	190.00	2,090.00T
loader hours	5	165.00	825.00T
packer hours	11	85.00	935.00T
man hours	4	50.00	200.00T
Big excavator hours	6	195.00	1,170.00T
Excavator hours	10.50	190.00	1,995.00T
packer hours	10.50	85.00	892.50T
man hours	4.50	50.00	225.00T
Excavator hours	10.50	190.00	1,995.00T
packer hours	10.50	85.00	892.50T
man hours	10.50	50.00	525.00T
excavator hours	11	190.00	2,090.00T
loader hours	6	165.00	990.00T
skidsteer hours	7	100.00	700.00T
man hours	6	50.00	300.00T
excavator hours	6	190.00	1,140.00T
oader hours	5	165.00	825.00T
skidsteer hoursw	4	100.00	400.00T
packer hours	4	85.00	340.00T
excavator hours	10.50	190.00	1,995.00T
oader hours	10.50	165.00	1,732.50T
kidsteer hours	10.50	100.00	1,050.00T
eacker hours	4	85.00	340.00T
xcavator hours	10.50	190.00	1,995.00T
oader hours	10.50	165.00	1,732.50T
kidsteer hours	10.50	100.00	1,050.00T
nan hours	4	50.00	200.00T

## Case 25-30002 Doc 190 Filed 10/14/25 Entered 10/14/25 09:31:34 Desc Main Document Page 19 of 40

		4		
DESCRIPTION	QTY	RATE		AMOUNT
excavator hours	8.50	190.00		1,615.00T
man hours	8.50	50.00		425.00T
excavator hours	10.50	190.00		1,995.00T
pader hours	10.50	165.00		
kidsteer hours	10.50	100.00		1,732.50T
ruck hours	10.50	100.00		1,050.00T
xcavator hours	10.50	190.00		1,050.00T
pader hours	10.50	165.00		1,995.00T
kidsteer hours	10.50	100.00		1,732.50T
uck hours	10.50	100.00		1,050.00T
xcavator hours	10.50	190.00		1,050.00T
ader hours	10.50			1,995.00T
kidsteer hours		165.00		1,732.50T
uck hours	10.50	100.00		1,050.00T
	10.50	100.00		1,050.00T
cavator hours	11	190.00		2,090.00T
ader hours.	11	165.00		1,815.00T
idsteer hours	11	100.00		1,100.00T
ck hours	11	100.00		1,100.00T
nior Living			SUBTOTAL	88,212.50
		•	TAX	1,800.42
			TOTAL	90,012.92
			PAYMENT	90,012.92
			TOTAL DUE	\$0.00

Invoice 631



BILL TO

Jesse Craig

DATE 07/05/2021 PLEASE PAY \$0.00

DUE DATE 08/04/2021

DESCRIPTION	QTY	RATE		AMOUN <sup>-</sup>
Generation - Level off lower level		***************************************		
skidsteer hours	10	100.00		1,000.00T
skidsteer hours	10	100.00		1,000.00T
truck hours	6	125.00		750.00T
2 men hours	17	65.00		1,105.00T
crushed gravel tons	27.82	13.50		375.57T
skidsteer hours	4.50	100-00		450.00T
•	•		SUBTOTAL	4,680.57
		<i>&gt;&gt;</i>	TAX	95.53
			TOTAL	4,776.10
			PAYMENT	4,776.10
			TOTAL DUE	\$0.00

Invoice 715



BILL TO

Jesse Craig

DATE 01/16/2022 PLEASE PAY \$0.00

DUE DATE 02/15/2022

DESCRIPTION	QTY	RATE		AMOUN
Grade Garage Floor				
Dec 8 - skidsteer hrs	9	100.00		900.009
Grade skidsteer hrs	9	175.00		1,575.007
man hrs	9	65.00		585.001
Dec 9 - skidsteer hrs	9	100.00		900.001
rade skidsteer hrs	10	175.00		1,750.00T
men hrs	18	65-00	$\gg_0$	1,170.00T
ader hrs	5	(F) \\		
truck hrs	18	135.00		875.00T
ec 10 - skidsteer hrs	6.50	100.00		2,430.00T
ade skidsteer hrs	6.50	175.00		650.00T
men hrs	19.50	65.00		1,137.50T
ader hrs	6.50	175.00		1,267.50T
truck hrs	13	135.00		1,137.50T
5% - Applied on Mar 18, 2022				1,755.00T
ENERATION			OUDTOTAL	246.93T
			SUBTOTAL	16,379.43
			TAX	1,048.61
			TOTAL	17,428.04
			PAYMENT	17,428.04
			TOTAL DUE	\$0.00

Invoice 716



BILL TO

Jesse Craig

DATE 01/16/2022 PLEASE PAY \$0.00

DUE DATE 02/15/2022

DESCRIPTION	QTY RATE	AMOUNT
Parking Lot and sidewalk at Generation		AWOUN
East side of Building		
North side of Building		5,931.03T
		3,275.00T
	SUBTOTAL	9,206.03
	<u>√</u>	187.90
	TAL	9,393.93
	PAYMENT	9,393.93
	TOTAL DUE	\$0.00

Invoice 745



BILL TO

Jesse Craig

DATE 05/22/2022 PLEASE PAY \$0.00

DUE DATE 06/21/2022

DESCRIPTION	QTY	RATE	AMOUNT
GENERATIONS - south side and west			, 4110011
side of building			
April 25 2022 - skidloader hours	1.50	100.00	150.00T
3 men hours	4.50	65.00	292.50T
April 26 2022 - skidsteer hours	10	100.00	1,000.00T
truck hours	9	135.00	
4 men hours	44	65.00	1,215.00T
oader hours			2,860.00T
- Hours	6	(5.9) V	990.00T
rock tons	10	00.00	
	18	26.66	479.88T
		SUBTOTAL	6,987.38

TAX

**TOTAL** 

**PAYMENT** 

TOTAL DUE

THANK YOU.

\$0.00

142.61

7,129.99

7,129.99



## **Exhibit C Clausen Construction, Inc.**

Parkside Project Estimate and Invoices

### Case 25-30002 Doc 190 Filed 10/14/25 Entered 10/14/25 09:31:34 Desc Main Document Page 25 of 40

Clausen Construction, Inc

412	20th	Ave	NW

Watertown, SD 57201

Phone: (605) 878-0254

Phone: (605) 532-5663 Fax: (605) 878-0267

Email: Clausenconstructioninc@gmail.com

Date:	5/3/20

 · · · · · · · · · · · · · · · · · · ·	 	 

Job Description

1+1		Banquet Development Job		
Qty	Units	Description	Unit Price	Line Total
1.00		Demo and Landfill	\$57,364.87	57,364.8
4275.00	yds	Building area Dig out & truck off site	\$4.95	21,161.2
6839.00	ton	Trucked in Engineered fill	\$9.54	65,244.0
650.00	ton	Granular fill sand under cement	\$12.75	8,287.:
442.00	yds	dig footings	\$4.50	1,989
190.00	yds	column footings	\$4.50	855
1264.00	ton	backfill footings	\$5.62	7,103.68
			NATIONAL STREET, SALES STREET, CONTRACTOR OF STREET, CONTRACTOR STREET, CONTRACTOR STREET, CONTRACTOR STREET,	AL ADMINISTRAÇÃO COMPANDA CONTRA DE SEMENTA DE PROPEZ PORTO (MAIS DE SEMENTA DESENTA DE SEMENTA DE
		Aason Engineering did all the quantities for us on this project as a double check of my figures. I think we should do demo as time and material. I do feel my numbers are a little stong on this however I just wanted to cover everything. I also want to add that no one knows how much material from the dig out we will be able to reuse so these quantities plus the engineered fill could change.	O MATERIAL SECULIAR S	
		Please call to go over my numbers. Thank You!		
			***************************************	
•				
				OPPONENT MET AND AND AN AND AND AND AND AND AND AND
		Excise		3,306.53
	0 -		Total	165,311.89

Thank you for your business!

#### Filed 10/14/25 Entered 10/14/25 09:31:34 Desc Main Case 25-30002 Doc 190 Page 26 of 40 Document **INVOICE #520**

412 20th Ave NW Watertown SD, 57201 PHONE 605.878.0254 | FAX 605.878.0267

Date: October 4, 2020

BILL TO

Jesse Craig



#### **FOR**

Parkside(County Fair) - partial demolition, excavation and fill

details	AMOUNT	
landfill cost	\$10,000.00	
excavator 45 hrs @ \$180 per hour	\$8,100.00	
sidedump 55 hrs @ \$125 per hour	\$6,875.00	
skidsteer 10 hrs @ \$100 per hour	\$1,000.00	
loader 45 hrs @ \$155 per hour	\$6,975.00	
Aug 10 trucks 12 hours @ \$125 per hour	\$1,500.00	
Aug 11 trucks 15 1/2 hrs @ \$125 per hour	\$1,937.50	
Aug 12 trucks 23 hrs @ \$125 per hour	\$2,875.00	
Aug 13 trucks 29 1/2 hrs @ \$125 per hour	\$3,687.50	
Aug 14 trucks 16.5 hrs @ \$125 per hour	\$2,062.50	
Sept 2 trucks 52.5 hrs @ \$125 per hour	\$6,562.50	<del>Olausen 9</del>
Sept 2 11 hrs excavator @ \$180 per hour	\$1,980.00	Jiaus <del>en o</del>

Case 25-30002 Doc 190		4 Desc Main
Sept 2 9 hrs loader @ \$155 per hour	Document Page 27 of 40 \$1,395.00	
Sept 3 44.5 hrs trucks @ \$125 per hour	\$5,562.50	
Sept 3 12 hrs excavator @ 180 per hour	\$2,160.00	
Sept 3 11 hrs loader @ \$155 per hour	\$1,705.00	
Sept 3 10 hrs man @ \$45 per hour	\$450.00	
Sept 4 12 hrs excavator @ 180 per hour	\$2,160.00	
Sept 4 16 hrs trucks @ \$125 per hour	\$2,000.00	
Sept 4 saw cut	\$500.00	
Sept 4 moving fiberoptic	\$400.00	
Sept 4 10 hrs loader @ \$155 per hour	\$1,550.00	
Sept 9 8 1/2 hrs trucks @ \$125 per hour	\$1,062.50	
Sept 9 12 hrs excavator @ \$180 per hour	\$2,160.00	
Sept 10 11 1/2 hrs excavator @ \$180 per hour	\$2,070.00	
Sept 10 34 hrs trucks @ \$125 per hour	\$4,250.00	
Sept 10 8 hrs loader @ \$155 per hour	\$1,240.00	
Sept 11 29 hrs trucks @ \$125 per hour	\$3,625.00	
Sept 11 5 1/2 hrs jackhammer	\$825.00	
Sept 11 11 1/2 excavator @ \$180 per hour	\$2,070.00	
Sept 11 9 hrs skidsteer @ \$100 per hour	\$900.00	
Sept 12 7 hrs packer @ \$65 per hour	\$455.00	
Sept 12 7 hrs man @ \$45 per hour	\$315.00	
Sept 12 9 hrs excavator @ \$180 per hour	\$1,620.00 RRSB-Clausen SD S	Subnoena 0036
Sept 12 9 hrs dozer @ \$165 per hour	\$1,485.00	

Case 25-30002 Doo	2 190 Filed 10/14/25 Entered 10/14/25 09:31:3
Sept 129 hrs packer @ \$100 per hour	\$900.00
Sept 12 28 1/2 trucks @ \$125 per hour	\$3,562.50
Sept 12 6 hrs truck @ \$125 per hour	\$750.00
Sept 12 2 hrs watertruck @ 175 per hour	\$350.00
Sept 14 5 hrs man @ \$45 per hour	\$225.00
Sept 14 5 hrs packer @ \$65 per hour	\$325.00
Sept 14 24 hrs trucks @ \$125 per hour	\$3,000.00
Sept 14 13 1/2 hrs excavator @ \$180 per	hour \$2,430.00
Sept 14 13 1/2 hrs dozer @ \$165 per hour	\$2,227.50
Sept 14 10 1/2 hrs packer @ \$100 per hou	1r \$1,050.00
Sept 14 2 hrs watertruck @ \$175 per hour	\$350.00
Sept 15 1 hr packer @ \$100 per hour	\$100.00
Sept 15 10 hrs dozer @ \$155 per hour	\$1,550.00

SUBTOTAL \$115,771.03

\$360.00

\$5,076.03

TOTAL \$115,771.03

Make all Checks Payable to Clausen Construction Inc.

Sept 23 2 hrs excavator @ \$180 per hour

Gravel material

If you have any questions concerning this invoice, use the following contact information:

Ron Clausen, 605.878.0254, clausenconstructioninc@gmail.com

THANK YOU FOR YOUR BUSINESS!

Desc Main

Invoice 554



**BILL TO** 

Jesse Craig

Parkside

DATE 11/15/2020 PLEASE PAY \$0.00 DUE DATE 12/15/2020

DESCRIPTION	QTY	RATE	. AMOUNT
mini excavator	8.50	145.00	1,232.50
skid steer	8.50	100.00	850.00
2 packers with men	20	65.00	1,300.00
trucks	12.50	125.00	1,562.50
mini excavator	10	145.00	1,450.00
skid steer	10	100.00	1,000.00
2 packers with men	20	65-99	1,300.00
big packer	4	<a href="#">√</a> <a hre<="" td=""><td>400.00</td></a>	400.00
trucks	20	125.00	2,500.00
mini excavator	12	145.00	1,740.00
skid steer	12	100.00	1,200.00
3 packers and men	36	65.00	2,340.00
big packer	3	100.00	300.00
trucks	24	125.00	3,000.00
mini excavator	12	145.00	1,740.00
skid steer	12	100.00	1,200.00
3 packers and men	36	65.00	2,340.00
trucks	12	125.00	1,500.00
mini excavator	8.50	145.00	1,232.50
skid steer	8.50	100.00	850.00
packer and man	8.50	65.00	552.50
skid steer	10.50	100.00	1,050.00
3 packers and men	31.50	65.00	2,047.50
2 men	21	45.00	945.00
truck	10.50	125.00	1,312.50

## Case 25-30002 Doc 190 Filed 10/14/25 Entered 10/14/25 09:31:34 Desc Main Document Page 30 of 40

DESCRIPTION	QTY	RATE		AMOUNT
loader	10.50	155.00		1,627.50
skid steer	10.50	100.00		1,050.00
3 packers and men	31.50	65.00		2,047.50
2 men	21	45.00		945.00
2 trucks	21	125.00		2,625.00
loader	10.50	155.00		1,627.50
Parkside (County Fair) fill, dig footings and	back fill footings		PAYMENT	44,867.50
			TOTAL DUE	\$0.00

Invoice 572



**BILL TO** 

Jesse Craig

DATE 12/21/2020 PLEASE PAY \$0.00 DUE DATE 01/20/2021

DESCRIPTION	QTY	RATE	AMOUNT
Loader	4	155.00	620.00
excavator	9	180.00	1,620.00
skid steer	9	100.00	900.00
2 trucks	11	125.00	1,375.00
loader	10	155.00	1,550.00
excavator	10	180.00	1,800.00
skid steer	10	100.00	1,000.00
4 trucks	40	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	5,000.00
loader	10	155.00	1,550.00
excavator	10	180.00	1,800.00
skid steer	10	100.00	1,000.00
4 trucks	40	125.00	5,000.00
4 trucks	20	125.00	2,500.00
excavator	5	180.00	900.00
oader	5	155.00	775.00
oader	10	155.00	1,550.00
dozer	10	165.00	1,650.00
packer	10	100.00	1,000.00
2 trucks	20	125.00	2,500.00
oader	10.50	155.00	1,627.50
dozer	10.50	165.00	1,732.50
packer	10.50	100.00	1,050.00
trucks	42	125.00	5,250.00
oader	10.50	155.00	1,627.50
pader	10	155.00	1,550.00

## Case 25-30002 Doc 190 Filed 10/14/25 Entered 10/14/25 09:31:34 Desc Main Document Page 32 of 40

DESCRIPTION	QTY	RATE		AMOUNT
dozer	10	165.00		1,650.00
packer	10	100.00		1,000.00
4 trucks	40	125.00		5,000.00
4 trucks	42	125.00		5,250.00
dozer	10.50	165.00		1,732.50
loader	10.50	155.00		1,627.50
packer	10.50	100.00		1,050.00
loader	10	155.00		1,550.00
dozer	10	165.00		1,650.00
packer	10	100.00		1,000.00
4 trucks	40	125.00		5,000.00
loader	7	155.00		1,085.00
packer	7	100.00		700.00
dozer	7	165.00		1,155.00
4 trucks	28	125.00		3,500.00
loader	10.50	155.00		1,627.50
packer	10.50	100.00		1,050.00
dozer	10.50	165.00		1,732.50
4 trucks	42	125.00		5,250.00
loader	5	155.00		775.00
packer	5	100.00		500.00
dozer	5	165.00		825.00
4 trucks	20	125.00		2,500.00
Material cost				32,768.08
Senior Living project			PAYMENT	126,905.58
			TOTAL DUE	\$0.00

Invoice 585



BILL TO

Jesse Craig

DATE 01/18/2021 PLEASE PAY \$0.00 DUE DATE 02/17/2021

AMOUNT	RATE	QTY	DESCRIPTION
500.00	100.00	5	skidsteer hours cleaning snow
300.00	100.00	3	skidsteer hours
1,665.00	185.00	9	excavator hours
1,485.00	165.00	9	dozer hours
405.00	45.00	9	man hours
1,572.50	185.00	8.50	excavator hours
1,402.50	165-00	8.50	dozer hours
382.50		8.50	man hours
832.50	185.00	4.50	excavator hours
742.50	165.00	4.50	dozer hours
9,287.50	PAYMENT		Footings
\$0.00	TOTAL DUE		

Invoice 634



BILL TO Jesse Craig

> DATE 07/05/2021

PLEASE PAY \$0.00 DUE DATE 08/04/2021

DESCRIPTION	QTY	RATE		AMOUNT
Parkside				
Truck hours	5	125.00		625.00T
men hours	20	65.00		1,300.00T
skidsteer hours	9	100.00		900.00T
skidsteer hours	10.50	100.00		1,050.00T
skidsteer hours	4.50	100.00		450.00T
men hours	. 18	65-90	<b>&gt;</b> ∨	1,170.00T
		✓	SUBTOTAL	5,495.00
		$\Diamond$	TAX	112.15
			TOTAL	5,607.15
			PAYMENT	5,607.15
			TOTAL DUE	\$0.00

## **Exhibit D Clausen Construction, Inc.**

The Lofts Project Estimate and Invoices

### Clausen Construction, Inc

## Job Estimate

412 20th Ave NW Watertown, SD 57201 Phone: (605) 878-0254 Phone: (605) 532-5663

Fax: (605) 878-0267

Email: Clausenconstructioninc@gmail.com

Date: 7/18/19

To: Heilman Const.

Laft5

Job Description

Quantity	Description Unit Price	Line Total
	Demalition of Burrites on broadway,	
	Finish cleaning up Horber Bor area	
	and ranoway basement undernooth	
	South porking lot, Owners will	
	be cosponably for all saw cuts	
	+ shoring if needed.	73,000.00
	Cost my be more if some un forcen	
	problems come in My Price is set at	
	1000 TN Hauled to Landfill any things	
	Digging footings and bring in some	
	Janel will be #25,000.00 that may	
	be more or loss all depends	25,000.00
	on the Finel Lesign.	
	Tota	

Quotation prepared by:

This is quotation on the goods named subject to conditions noted below.

(Describe any conditions pertaining to these pricesand any additional terms of the agreement. You may want to include contingencies that will affect the quotation.)

To accept this quotation, sign here and return:

#### **INVOICE #367**

### CLAUSEN CONSTRUCTION, INC.

412 20TH AVE NW WATERTOWN SD, 57201

PHONE 605.878.0254 | FAX 605.878.0267

DATE

BILL TO

THE LOFTS



FOR

SAND AND BACKFILLING

**DETAILS** 

AMOUNT

HAULING SAND OUT 48 HRS (TRUCK AND LOADER) \$13

\$13,920.00

BACKFILL AROUND ELEVATOR SHAFT

\$2,342.00

BACKFILL BEHIND WALLS (4 FT UP ON WALL)

\$6,596.20

DIGGING FOOTINGS

\$16,000.00

SUBTOTAL

\$38,858.20

TAX RATE

TOTAL \$38,858.20

MAKE ALL CHECKS PAYABLE TO CLAUSEN CONSTRUCTION INC.

IF YOU HAVE ANY QUESTIONS CONCERNING THIS INVOICE, USE THE FOLLOWING CONTACT INFORMATION:

RON CLAUSEN, 605.878.0254, CLAUSENCONSTRUCTIONINC@GMAIL.COM

THANK YOU FOR YOUR BUSINESS!

### Case 25-30002

Doc 190

Filed 10/14/25 Entered 10/14/25 09:31:34 Desc Main Document Page 38 of 40

INVOICE #470

412 20th Ave NW Watertown SD, 57201

PHONE 605.878.0254 | FAX 605.878.0267

Date: August 8, 2020

BILL TO

The Lofts



**FOR** 

finish work

details

**AMOUNT** 

Pearock okayed by Jesse - 125 ton @ \$14.50 per ton	\$1,812.50
2 men pulling out pilings	\$1,850.00
Black dirt	\$380.00

SUBTOTAL \$4,042.50

Excise tax 2.0%

TOTAL \$4,125.01

Make all Checks Payable to Clausen Construction Inc.

If you have any questions concerning this invoice, use the following contact information:

Ron Clausen, 605.878.0254, clausenconstructioninc@gmail.com

THANK YOU FOR YOUR BUSINESS!

# **Exhibit E Clausen Construction, Inc.**

**Craig Lake Property Invoice** 

Invoice 726



**BILL TO** 

Jesse Craig

DATE 02/18/2022 PLEASE PAY \$2,335.84

DUE DATE 03/20/2022

AMOUNT	QTY RATE	DESCRIPTION
17,500.00T		Lake home
17,500.00	SUBTOTAL	
357.18	TAX	
17,857.18	TOTAL	
15,521.34	PAYMENT	
\$2,335.84	TOTAL DUE	